

1 ANDREW V. JABLON (SBN 199083)  
E-Mail: ajablon@rpblaw.com  
2 STACEY N. KNOX (SBN 192966)  
E-Mail: sknox@rpblaw.com  
3 RESCH POLSTER & BERGER LLP  
1840 Century Park East, 17th Floor  
4 Los Angeles, California 90067  
Telephone: 310-277-8300  
5 Facsimile: 310-552-3209

6 Attorneys for Defendant Odell Beckham,  
Jr.

7  
8  
9  
10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

12 ASHLEY PARHAM, JANE DOE, and  
13 JOHN DOE,

14 Plaintiffs,

15 vs.

16 SEAN COMBS a/k/a "P. Diddy," "Puff  
Daddy," "Love," "Puffy" and "Diddy,"  
17 KRISTINA KHORRAM, SHANE  
PEARCE, RUBEN VALDEZ, JOHN  
18 PELLETIER, ODELL BECKHAM JR.,  
DREW DESBORDES a/k/a "Druski,"  
19 JACQUELYN WRIGHT a/k/a "Jaguar  
Wright", HELENA HARRIS-SCOTT,  
20 MATIAS GONZALEZ, BRANDI  
CUNNINGHAM, JANICE COMBS,  
21 KEITH LUCKS a/k/a "Big Homie CC,"  
and JOHN and JANE DOES 1-10,

22 Defendants.  
23

Case No. 3:24-cv-07191-RFL

**DECLARATION OF AJAY  
SANGHA IN SUPPORT OF  
MOTION OF ODELL BECKHAM  
JR. FOR THE IMPOSITION OF  
SANCTIONS AGAINST  
PLAINTIFFS AND THEIR  
COUNSEL PURSUANT TO FED. R.  
CIV. P. 11; MEMORANDUM OF  
POINTS AND AUTHORITIES**

Judge: Hon. Rita F. Lynn  
Date: October 14, 2025  
Time: 10:00 a.m.  
Crtrm.: 15

Judge: Hon. Rita F. Lin

Trial Date: None Set

24  
25 ///

26 ///

27 ///

28 ///

**DECLARATION OF AJAY SANGHA**

I, Ajay Sangha, declare as follows:

1. I am over the age of 18, and have personal knowledge of the matters set forth herein. If called upon and sworn as a witness, I could and would competently testify to the matters set forth herein.

2. I am a friend and business associate of Odell Beckham, Jr. In 2018 I was, among other things, his personal assistant. In my capacity as Mr. Beckham's personal assistant, I lived with him at a house on Solar Drive in Los Angeles during the summer of 2018.

3. While staying in Los Angeles, if Mr. Beckham and I were to go out, he would hire a car service - Red Limo Line, LLC ("Red Limo") - to drive us. Grigor Vahanyan, who I understand to be the owner of the car service, would drive us, and if we were going out with multiple people and needed additional cars, Red Limo would provide an additional driver.

4. On March 22, 2018, Mr. Vahanyan drove me and Mr. Beckham to various locations in the Los Angeles area, including the Velo Sports Center in Carson, CA where Mr. Beckham had a training session. We returned home to Solar Drive at approximately 6:00 p.m.

5. Mr. Beckham decided that he wanted to stay in that evening, and invited Jeremy Hill to hang out with us to play video games.

6. Attached as Exhibit "A" is a screen capture from a video taken that evening by Mr. Beckham, Jr. In the video you can see me and Mr. Hill. The video was taken at 10:02 p.m., and Mr. Hill stayed for several hours before leaving that night.

7. Mr. Beckham and I remained at Solar Drive until approximately 2:30 p.m. the following day, March 23, 2018, when Mr. Vahanyan picked us up to go to another training session.

8. On the evening of March 23, 2018, Mr. Beckham and I went out to eat and to various bars in the Los Angeles area. We returned home to Solar Drive at


1 and to various bars in the Los Angeles area. We returned home to Solar Drive at  
2 approximately 4:30 a.m.

3 9. The following morning, we left the home on Solar Drive at 9:30 a.m. to  
4 go to Santa Monica Beach where Mr. Beckham worked out with his personal trainer,  
5 Jamal Liggin.

6 10. Attached hereto as Exhibit "B" is a true and correct copy of a photograph  
7 I took of Mr. Beckham's dogs at the Santa Monica beach while I was waiting for him  
8 to complete his work out. Also attached as part of Exhibit B is a screenshot of the  
9 Metadata of the photograph.

10 I declare under penalty of perjury under the laws of the United States of  
11 America that the foregoing is true and correct.

12 Executed on this 24th day of April, 2025, at Los Angeles, California.

13  
14   
Ajay Sangha (Apr 24, 2025 14:16 PDT)

Ajay Sangha

# Decl of Ajay

Final Audit Report

2025-04-24

Created:	2025-04-24
By:	Andrew Jablon (ajablon@rpblaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAG2y2UasQ9q9mUPWalRtcNKSr0PzNli9f


## "Decl of Ajay" History

 Document created by Andrew Jablon (ajablon@rpblaw.com)

2025-04-24 - 9:00:56 PM GMT

 Document emailed to ajay@[REDACTED].com for signature

2025-04-24 - 9:01:17 PM GMT

 Email viewed by ajay@[REDACTED].com

2025-04-24 - 9:15:26 PM GMT

 Signer ajay@[REDACTED].com entered name at signing as Ajay Sangha

2025-04-24 - 9:16:01 PM GMT

 Document e-signed by Ajay Sangha (ajay@[REDACTED].com)

Signature Date: 2025-04-24 - 9:16:03 PM GMT - Time Source: server

 Agreement completed.

2025-04-24 - 9:16:03 PM GMT